

REMARKS/ARGUMENTS

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. Claims 14 and 15 have been amended hereby. Claims 14, 15, and 18 are pending for further examination.

Claims 14 and 18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Miller et al. (U.S. Pat. 5,959,869) in view of Siegel et al. (U.S. Pat. 4,413,260) and Barrett et al. (U.S. Pat. 5,214,761) and Werth et al. (U.S. Pat. 4,369,442).

Applicant submits that the applied references do not teach all elements of independent claim 14, as amended.

For example, independent claim 14 recites, *inter alia*, “a second button touch in a second area of the touch screen as a request for redeeming one credit from the number of credits in said file and removing said redeemed credit from the number of credits...” and “said interface requiring a second code for using said second button to function as a request for redeeming one credit from the number of credits in said free play reserve file and removing one credit from the credit reserve in said free play reserve file when this second button is touched.”

The Office Action concedes that Miller fails to disclose “touching of a second button in a second area of the touch screen as a request for removing in said file one credit of the number of credits.”

To compensate for this deficiency of Miller, the Office Action introduces Siegel. According to the Office Action “Siegel teaches an audio reproductions system, wherein

an operator can offer the manager of the reproduction system a given number of credits, one credit corresponding to the fee necessary to select a song (through actuation of the 'free play credit entry function'), enabling the operator to give the special benefit of free use to the manager."

Applicant respectfully submits that this is a mischaracterization of Siegel. Siegel does teach that credit line 47 can be enabled to provide free credits when credit button 18 is pushed. (col. 3, lines 29-32). This same credit line 47 can be activated by pushing button 24 on the remote (col. 2, lines 51-53). Pushing of button 24 transmits a pulse to receiver 28, corresponding to receiver output 34, which provides a signal to line 47 (col. 2, line 64 – col. 3, line 23).

Thus, using Siegel, an operator can enable the addition of free credits, although, once enabled, anyone pushing the free credit button 18 or the add credit button 24 can add credits to the credit memory. Further, once the free credit line is enabled, anyone, operator, manager or user, who has access to the remote control (or knows where the free credit button is) can add credits to the credit memory. Thus, Siegel does not reserve the addition of free credits for an operator alone.

Further, a single credit memory is provided. Thus whether a credit is added by use of the free credit line, or by payment of money, there is no distinction in the memory of Siegel. The next person, be it operator, manager or user, to select a song after a free credit is added, will be the one who can use that credit. Thus the free credit system of

Siegel is not reserved for exclusive manager protected use, nor is there a teaching or suggestion in Siegel that such reservation could or should exist.

This can be further seen in that claim 14, as amended, recites, *inter alia*, “a free play reserve file on the memory is readable/writeable to store the number of credits as a credit reserve, said free play reserve file being separate from a general reserve file used to store credits based on user payments.” Siegel only teaches a single credit memory, because Siegel provides no teaching or suggestion that anyone other than the next person to select a song, be it operator, manager or user (patron) should have access to a free credit.

The Office Action does concede that Siegel (along with Miller and Barrett) fails to teach “said interface requiring a second code for enabling said second button to function as a request for removing in said file one credit to the credit reserve then this second button is touched,” and introduces Werth to compensate for this deficiency.

Werth, however, teaches providing system access to servicemen though one protection mechanism and providing output register access to owners through another protection mechanism (col. 4, lines 6-9). Werth, however, is totally silent on the concept of allowing servicemen to protectedly add free credits and owners to protectedly access them.

It is assumed that the Examiner’s position is that combination of Werth and Siegel teaches the noted portions of the claimed combination, i.e., “a second button touch in a second area of the touch screen as a request for redeeming one credit from the number of

credits in said file and removing said redeemed credit from the number of credits...” and “said interface requiring a second code for using said second button to function as a request for redeeming one credit from the number of credits in said free play reserve file and removing one credit from the credit reserve in said free play reserve file when this second button is touched,” but such an interpretation is improper.

The only mention/suggestion having anything to do with free credits comes from Siegel, and Siegel is silent on the notion of a system where an operator protectedly enters free credits and a manager protectedly accesses them. Thus, a combination of Werth and Siegel would actually produce a system where an operator (serviceman) might have protected access to service a jukebox (e.g. repair it or collect coins) and a manager might have protected access to the output registers (e.g. to see how much the jukebox brought in), but all of the cited references are completely silent on the notion of providing a reserve of free credits different from credits accumulated by payment (free play reserve file different from general reserve file) for protected manager redemption (requiring a second code for using said second button to function as a request for redeeming one credit from the number of credits in said free play reserve file), said credits being provided in a protected manner by an operator (requiring a first code for using said first button to function as a request for adding one credit to the credit reserve in said free play reserve file) . Only Applicant’s own specification provides such teaching.

Additionally, all of the prior art is silent on the notion of a free credit reserve file different from a general credit reserve file.

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For at least these reasons, Applicant submits that claim 14 is allowable over the prior art of record. Claim 18 should be allowable based at least on its dependency from allowable claim 14. Reconsideration and allowance are respectfully requested.

Claim 15 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Miller, Siegel, Barrett and Werth as applied to claim 14 and further in view of Kalis et al. (6,212,138).

Kalis does not overcome the noted deficiencies of the rejection with respect to claim 14, so claim 15 should be allowable based at least on its dependency from claim 14. Reconsideration and allowance are respectfully requested.

Should the Examiner have any questions regarding this case, or deem that any formal matters need to be addressed prior to allowance, the Examiner is invited to call the undersigned attorney at the phone number below.

Respectfully submitted,

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